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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> , f/k/a General Motors Corp., <i>et al.</i>	:	Case No.: 09-50026 (MG)
	:	
Debtors.	:	(Jointly Administered)

**NOTICE OF FILING PROPOSED STIPULATION AND ORDER RESOLVING  
MOTION OF GENERAL MOTORS LLC TO ENFORCE THE BANKRUPTCY  
COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION [ECF No. 13584]**

**(PILGRIM PUTATIVE CLASS ACTION)**

**PLEASE TAKE NOTICE** that on January 19, 2016, General Motors LLC (“New GM”) filed the *Motion Of General Motors LLC Pursuant To 11 U.S.C. §§ 105 And 363 To Enforce The Bankruptcy Court’s July 5, 2009 Sale Order And Injunction, And The Bankruptcy Court’s Rulings In Connection Therewith (Pilgrim Putative Class Action)*, dated January 19, 2016 [ECF No. 13584] (“Pilgrim Motion to Enforce”).

**PLEASE TAKE FURTHER NOTICE** that the parties to the Pilgrim Motion to Enforce have resolved the issues raised therein pursuant to the terms of a *Stipulation And Order Resolving Motion Of General Motors LLC To Enforce The Bankruptcy Court’s July 5, 2009 Sale Order And Injunction [Ecf No. 13584]* (“Proposed Pilgrim Stipulation and Order”).

**PLEASE TAKE FURTHER NOTICE** that New GM hereby files the Proposed Pilgrim Stipulation and Order, attached to this notice as **Exhibit “1.”**

Dated: New York, New York  
June 5, 2019

Respectfully submitted,

/s/ Scott I. Davidson  
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